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Attorneys for Defendant Google Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

RICK WOODS, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

GOOGLE INC.,

Defendant.

NIX, PATTERSON & ROACH, LLP

Jeffrey J. Angelovich (*Pro Hac Vice*)
Brad E. Seidel (*Pro Hac Vice*)
Andrew G. Pate (*Pro Hac Vice*)
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Case No. 11-cv-1263-EJD

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
EXPERT DISCOVERY**

1 Plaintiff Rick Woods and Defendant Google Inc., by and through their counsel of record
2 herein, hereby stipulate and agree, subject to Court approval, to the following regarding the scope
3 of discovery and testimony relating to experts in this matter:

4 WHEREAS, in order to avoid consuming the parties' and the Court's time and resources
5 on potential discovery issues relating to experts, the parties have agreed to certain limitations on
6 the scope of expert-related discovery and testimony in this matter.

7 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Defendant
8 and subject to Court approval, as follows:

9 The following categories of data, information, or documents need not be disclosed by any
10 party, and are outside the scope of permissible discovery (including deposition questions):

11 1. Any notes or other writings taken or prepared by or for an expert witness in
12 connection with this matter, including correspondence or memos to or from, and notes of
13 conversations with any person, including, but not limited to, the expert's assistants and/or clerical
14 or support staff, other fact or expert witnesses or non-testifying expert consultants, or attorneys
15 for the party offering the testimony of such expert witness, unless the expert witness relies on
16 those notes or other writings in connection with the expert witness' opinions in this matter; and

17 2. Any oral or written communication between an expert witness and any person,
18 including, but not limited to, the expert's assistants and/or clerical or support staff, other fact or
19 expert witnesses or non-testifying expert consultants, or attorneys for the party offering the
20 testimony of such expert witness, unless the expert witness relies on those oral or written
21 communications in connection with the expert witness' opinions in this matter.

1 **IT IS SO STIPULATED**

2
3 DATED: June 4, 2015

KESSLER TOPAZ MELTZER & CHECK, LLP

4 By: /s Matthew Mustakoff
Matthew L. Mustakoff

5 **NIX, PATTERSON & ROACH, LLP**

6 By: /s Brad Seidel
7 Brad E. Seidel

8 *Interim Co-Lead Class Counsel*

9
10 DATED: June 4, 2015

MAYER BROWN LLP

11 By: /s Edward D. Johnson
12 Edward D. Johnson

13 *Counsel for Defendant, Google Inc.*

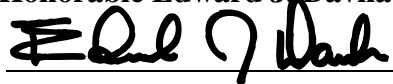
14 Filer's Attestation: In compliance with General Order 45(X)(B), I hereby attest that concurrence
15 in the filing of this Stipulation has been obtained from Interim Co-Lead Class Counsel, Matthew
16 Mustakoff and Brad Seidel.

17 /s/ Edward D. Johnson
18 Edward D. Johnson

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20 **IT IS SO ORDERED**

21 DATED: 6/8/2015

Honorable Edward J. Davila

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